

**THE FOREST OF NISENE MARKS STATE PARK
PRELIMINARY GENERAL PLAN/DRAFT EIR**

RESPONSES TO COMMENTS

Sharp:

1. As presented in this General Plan, Alternative B is the preferred alternative. Page 173 in the Environmental Analysis section, Alternatives to the Proposed Action, discusses the features of Alternative C and why it was not chosen as the preferred alternative. The consideration of loop trails and multi-use or shared trails will be evaluated in a future comprehensive Unit Trails Plan that will be completed after the general plan has been approved. Please see The Plan section, Access and Trails, page 92, for a discussion of the goals and guidelines for future trails planning.
2. The park currently allows equestrian access on the multi-use trails that are located in the lower section of the park, below the Steel Bridge. The General Plan does not propose to eliminate this existing use.
3. According to visitor use statistics, hiking is the most common activity in the park, followed by running and bicycling (see page 67). Foot travel was represented by 77 percent of the use, with bicycling at 23 percent. Because these uses are expected to continue, the plan goals and guidelines emphasize the park's commitment to enhance recreational opportunities for a variety of users and to provide increased trail access, loop trails, and regional trail connections.

Renault:

4. The Department strives to provide a variety of recreation opportunities for the public. Although mountain biking did not exist at the time the deed was developed, it has become a legitimate and popular form of outdoor recreation. Deed restrictions are interpreted so as to achieve the ultimate purpose for the gift and not limit uses of the property. Mountain biking, appropriately managed like hiking and camping, permit visitors to enjoy the natural resources in the park, which is the primary goal of the donation." The Department's legal staff has interpreted the language from the deed "...camping and associated activities" to include mountain biking as an appropriate activity in the park. Currently mountain bikes are restricted to the fire road, which is considered a multi-use trail (excluding horses above the Soquel Augmentation Line). The plan does not change the designation of any trails. This general plan proposes the development of a comprehensive Unit Trails Plan for the entire park to be completed after approval of the General Plan.

Monterey Bay Unified Air Pollution Control District / Brennan:

5. In the Environmental Analysis section, page 124, Air Quality - Air Quality Regulatory Context, paragraph 3, revise the following sentence:

The NCCAB is currently designated ~~as “non attainment” for state standards for ozone and PM₁₀ (California Air Resources Board [CARB], 2000) a maintenance area for the federal one-hour ozone ambient air quality standard.~~ The NCCAB is “attainment” or “unclassified” with respect to the other state and national ambient air quality standards.

6. In the Environmental Analysis section, page 124, Air Quality – Air Quality Regulatory Context, paragraph 5, add a final sentence:

The most recent AQMP was adopted in 2000.

7. In the Environmental Analysis section, page 125, Air Quality – Existing Air Quality, paragraph 3, revise the following text:

MBUAPCD’s air quality monitoring stations provide information on ambient concentrations of criteria air pollutants. Appendix D, Regional Air Quality Data, presents 1999-2002 exceedances of PM10 and ozone in the North Central Coast Air Basin. Table 8 is a five-year summary of the highest annual criteria air pollutant concentrations of ozone and PM10. The ozone data shown in Table 8 are a compilation of data from all of the monitoring stations in the NCCAB since ozone is a regional pollutant. Pollutant data for PM10 was collected at the Salinas air quality monitoring station. PM10 is more local in character than ozone, and the Salinas monitoring station is the closest PM10 monitoring station to the project site. Air pollutant concentrations are compared with the state ambient air quality standards, which are generally more stringent than the corresponding national standards. The major criteria air pollutants are described below.

Table 8, page 126, will be deleted. Appendix D, Regional Air Quality Data will be added.

8. In the Environmental Analysis section, page 133, Air Quality – Potential Impacts and Mitigation Measures, paragraph 3, add a final sentence:

Current MBUAPCD thresholds of significance for volatile organic compounds (VOC) and NO_x will be used to determine

project level impacts on regional ozone levels at the time specific information is available.

9. In the Environmental Analysis section, page 134, Impact Air-2. Potential Operational Emissions Impacts, paragraph 1, insert the following text:

Traffic levels would increase due to increases in visitation to the Park and jobs related to the administration, operations, and maintenance of the Park. The use of prescribed burning as a forest management tool may contribute to increased emissions of VOCs and NO_x.

In the Environmental Analysis section, Page 135, Mitigation Measure Air-2, add a bullet:

The use of prescribed burning will comply with all air quality regulations, including Smoke Management Plans, adherence to prescriptions, and burning on days where adequate smoke dispersal occurs.

Mitchell:

10. Above the Soquel Augmentation Line mountain bikes are currently only allowed on the fire road. The General Plan proposes land management zones based on resource sensitivity and protection, the diversity of recreational opportunities, and visitor use concentration in designated areas of the park. The land management zones will allow consideration of an array of recreation activities and facilities appropriate for these specific zones. Final determination of the activities and facilities allowed will be made after site-specific evaluation. This plan does not authorize the use of mountain bikes on any remote hiking trails.

11. In The Forest of Nisene Marks State Park, as in all parks, there is the potential for inappropriate trail behavior, including the use of trails by non-authorized user groups, and inappropriate use by others. There is current Department policy stating that bicycles be operated at a safe speed and in a responsible manner, and that off-trail or off-road (cross country) bicycle use is prohibited. Realizing that staff and funding may limit the amount of trail patrol for optimum enforcement, the Department supports all efforts to minimize user conflicts, including creating trail community and user responsibility through joint trail user projects, user events, volunteer user patrol, and public education on proper trail etiquette. Education, coupled with peer pressure and the enforcement of rules, will help to minimize these types of problems.

12. Park trails will be evaluated during the development of a comprehensive Unit Trails Plan for the entire park, which will occur after the approval of this

General Plan. (Please see The Plan section, page 92, first bullet). The trails plan will guide the location, distance, use, and maintenance of existing and future trails. The plan will evaluate appropriate trail uses, including shared or multi-use trails, as well as potential resource impacts as a result of trail use. Taking visitor use concentration and visitor experience into account this trail plan will be developed under the guidance of park staff, in coordination with the appropriate resource agencies, and will incorporate public involvement and review.

Please see response to item number 4 regarding interpretation of the original deed.

Widom:

13. Please see response to item number 4 regarding the original deed and response to item number 12 regarding the future development of a comprehensive unit trails plan.

Leet:

14. Please see response to item number 12 for a discussion of the comprehensive Unit Trails Plan to be initiated after approval of this General Plan.

Nelson:

15. Please see response to item number 12 for a discussion of the comprehensive Unit Trails Plan to be initiated after approval of this General Plan.

16. Unauthorized trail use is an ongoing issue in many parks and open space areas. Please see response to item number 11 for further discussion of this topic.

Lilly:

17. Please see response to item number 12 for a discussion of the comprehensive Unit Trails Plan to be initiated after approval of this General Plan.

18. Please see response to item number 11 for a discussion of trail user responsibility and etiquette.

Legare:

19. Please see response to item number 1 for a discussion the preferred alternative and consideration of shared use trails with the development of a Unit Trails Plan.

Utterback:

20. Please see response to item number 12 for a discussion of the comprehensive Unit Trails Plan.

Vandeman:

21. Park staff are very aware of the impacts resulting from exotic species and have developed goals and guidelines to facilitate the management and control of exotic plants and wildlife. The Department's commitment to exotic species management is reinforced with the following goals and guidelines presented in the plan: Vegetation Management Guidelines, page 87, fourth bullet, directs the Department to "develop and implement a long-term program to control and /or eradicate exotic plants to prevent the establishment and spread of non-native species that could displace native species and disrupt natural communities"; page 87, fifth bullet, states that "non-native animal species will be discouraged through appropriate habitat management and when necessary by direct control measures"; and page 89, Exotic Plants, presents a goal and guideline pertaining to the importance of exotic plant control.

22. The Forest of Nisene Marks State Park currently allows leashed dogs in certain areas of the park. The Department rules and regulations regarding dogs will continue to be enforced, as referenced on page 90, sixth bullet, in the Guidelines for Wildlife Management: "Domestic dogs accompanying visitors to the park will be controlled in accordance with the Department's rules and regulations."

23. Your comment that we should "restrict bicycles and all other vehicles (including mountain boards) to pavement" is not viable because there are currently no paved roads in The Forest of Nisene Marks State Park.

County of Santa Clara, Parks and Recreation Department / Gibson:

24. Thank you for providing additional regional trail information that will assist in the park's future trail planning. The Department is committed to providing and enhancing regional trail connections for all types of users. We look forward to coordinating with the County of Santa Clara, Parks and Recreation Department during development of the comprehensive Unit Trails Plan for The Forest of Nisene Marks State Park.

Kelly:

25. Department staff, including the park's resource ecologists, have evaluated The Forest of Nisene Marks State Park in terms of the Department's legal definition of a natural preserve, as contained in the Public Resources Code. According to PRC Sect. 5019.71, "natural preserves consist of ... areas of

outstanding natural or scientific significance” that are established to preserve significant features such as rare or endangered plant and animal species and their supporting ecosystems, and representative examples of plant or animal communities existing in California prior to the impact of civilization. The park has a history of disturbance and yet many beautiful landscapes, wildlife, plants, streams, and other sensitive and valuable resources remain. However the resources contained in the park are not unique to this region, or to the Santa Cruz Mountains in particular. The designation of Natural Preserve is typically reserved for sensitive and unique resource areas that require a higher level of resource management and regulated use. The Department has determined that the sub-classification of Natural Preserve is not appropriate, and that the State Park designation adequately protects the significant resources at this unit, while allowing future consideration for appropriate access and use.

26. Please see response to item number 10 for a discussion of inappropriate trail use.

27. Horses and mountain bikes are currently allowed in the park, with restricted access. The General Plan does not specifically change these restrictions, but calls for the development of a comprehensive Unit Trails Plan (see The Plan section, page 92) at a later date to fully evaluate recreation potential and appropriate trail use throughout the park.

Sumpf:

28. Please see response to item number 4 for a discussion on the original deed. The General Plan does not change the current restrictions for mountain bike use throughout the park. The Land Management Zones discussed on pages 109-112 and graphically shown on Figure 8, Alternative B, the preferred plan, allow the consideration of appropriate levels of recreation in certain areas of the park, based on resource sensitivity and protection, the diversity of recreational opportunities, and visitor use concentration in designated areas. Future trail planning, as part of the comprehensive Unit Trails Plan, will evaluate appropriate trail locations and users based on these land management areas. Please see responses to item number 10 and item number 12 for further discussion of the trails plan.

Smith:

29. Please see response to item number 1 regarding the preferred alternative and considerations for bicycle recreation in the park.

Fichter:

30. Please see response to item number 12 for a discussion of the comprehensive Unit Trails Plan to be developed following approval of the General Plan.

Sierra Club / Jammal:

31. The tiered approach to programmatic or general planning is clearly authorized by the California Environmental Quality Act (CEQA) and has been reviewed and approved in a number of court cases. The courts have ruled that an Environmental Impact Report (EIR) is required for a general or “master” plan, but as there are not specific development projects proposed in such a plan to analyze for environmental effects, there is a reduced requirement, under CEQA guidelines, for a detailed level of specificity in the EIR.

The Preliminary General Plan/Draft EIR for The Forest of Nisene Marks State Park generally discusses the possible impacts of future development as authorized by the General Plan and commits the Department to two general concepts: 1) to follow the management goals and guidelines in the General Plan that are adopted to guide the development in a way that will avoid or mitigate impacts, and 2) to perform more detailed project analysis, including environmental analysis, prior to final decision and approval of those projects. These project-specific CEQA documents will be able to provide more detailed analysis of potential resource impacts and mitigation measures, including requirements for monitoring and success criteria, if applicable. All future development projects for the park will follow the appropriate environmental review requirements.

32. The completion of a comprehensive biological inventory of the park is not appropriate for this tier 1 level of general plan, which is intended to provide a vision for the future resource conditions and visitor experience and to propose broad management goals and guidelines that will direct future management of the park. The General Plan provides an understanding of significant resource values as the basis for addressing general planning issues, and establishes a framework and direction for more focused resource planning that occurs beyond the approval of the plan. Collection of more detailed resource data is appropriate and necessary in subsequent planning phases. As facilities are proposed, site-specific surveys will be completed. These surveys will identify individuals or populations of special status species. It is at this time, when the project scope is fully defined, that potential impacts can be analyzed and appropriate mitigation measures identified.

33. The General Plan indicates on page 14 that “several of the Park’s plant communities are considered rare by the California Department of Fish and Game, including purple needlegrass grassland, northern maritime chaparral,

redwood forest, red alder riparian forest, and coastal and valley freshwater marsh.” On page 16, the plan also identifies Woollyleaf Manzanita Series as another rare community that is located in the park. Your comment did not identify any specific habitats noted as occurring in the park, but that were not listed as sensitive; therefore plan revisions could not be considered at this time.

34. Maps showing the location of all park features and resources, including sensitive species and habitats, are not required to be included in the General Plan. The location of sensitive species or habitats may not be disclosed due to a number of factors, including rarity and vulnerability to collecting, disturbance, and habitat destruction.

35. The carrying capacity analysis as described in this plan incorporates adaptive management methodologies as well as use intensity zones which are based primarily on the significance, sensitivities, and constraints of the resources. For example, as described on page 102, the area designated for low allowable use intensity contains “important resource values that are especially vulnerable to impacts for activities and development” including significant geologic features, and “areas with high ecological sensitivities such as rare and endangered flora, rare natural communities, threatened and endangered wildlife and aquatic life, and important habitats for these species.” Potential management actions are also described. The detailed analysis required in determining specific standards, indicators, and monitoring protocols is not appropriate for this level of planning. These elements will be determined in future planning efforts associated with specific development projects.

36. A detailed description and location of all geographic features is not required for this General Plan. Please see response to item number 31 for a discussion of the scope of this document.

37. The CEQA checklist is not a required component of the Environmental Impact Report. The Environmental Analysis section includes a summary of potential impacts and mitigation measures (page 118) as well as a complete discussion of all pertinent elements indicated on the checklist, including thresholds for significance, potentially significant impacts, and potential mitigation to avoid or reduce these impacts.

38. The Department has followed all California Environmental Quality Act (CEQA) requirements regarding consultation with public agencies. As indicated on page 118, a Notice of Preparation was circulated to state and local planning agencies in February 2001. Agencies receiving this notice included the California Coastal Commission, Department of Conservation, Department of Forestry and Fire Protection, Office of Historic Preservation, Department of Fish and Game, Native American Heritage Commission, Caltrans, State Lands Commission, and the Regional Water Quality Control Board. In addition, the state, federal and local resource agencies as well as environmental organizations

(including the U.S. Fish and Wildlife Service, The Department of Fish and Game, and the California Native Plant Society) provided the most currently available information at the time of General Plan preparation.

Hanna & Hedpern:

39. Please see response to item number 11 and number 28 for further discussion of the consideration of bicycle recreation and unauthorized use in the park.

Seliskar:

40. Please see response to item number 10 and item number 11 for a discussion of the Department's current bicycle use policy and inappropriate use.

41. Please see response to item number 4 for a discussion of the original deed.

Horton:

42. The Department appreciates the participation and contributions of R.O.M.P. and other organizations in the planning process for The Forest of Nisene Marks State Park. We agree that public education and activities pertaining to trail use, maintenance, and user etiquette may promote "ownership" and responsible use. Please see response to item number 11 for further discussion of trail use and user education opportunities. Please see response to item number 12 for a discussion of the comprehensive Unit Trails Plan with regard to the consideration of shared use trails for enhanced access to the park.

Rayne:

43. The "potential sites" indicated on Alternative B, the Preferred Plan, show possible facility locations (visitor center/education facility and camping area). Land management areas have been indicated by the delineation of specific management zones. The Mangels Ranch area is situated in the management zone titled "Land Managed for Resource Protection and More Intensive Recreation." Resource protection is a high priority in each of the management zones. Therefore the entire park, including the Mangels Ranch area, could be utilized as a nature study site with the incorporation of Alternative B. As indicated on page 112, Resource Protection and More Intensive Recreation, the Department has provided a number of guidelines that would avoid or minimize impacts to sensitive resources located in this management zone, including locating facilities away from sensitive areas, and using signs, fencing, walls, and other features to direct visitors away from sensitive resources. The entire park, including the Mangels Ranch area, is also guided by the General Unit Management Goals and Guidelines, Resource Management Guidelines, beginning on page 84 in The Plan section.

44. Use designation of a particular trail as a nature trail site would be considered during the development of a comprehensive trails plan. During this trail plan development, designation of shared use will be evaluated based on site-specific conditions, including topography, soil, and the presence of other sensitive natural and cultural resources. The Department recognizes that a number of sensitive habitats occur throughout the park, including purple needlegrass grassland. As indicated by the goal statements and associated guidelines on pages 87 and 88, sensitive resource protection is a priority of the Department and this General Plan.

Apple:

45. You are incorrect in stating that “The ‘no bikes’ interpretation of the deed was indeed made in the mid ‘80’s and accounts for the existing rules restricting mountain bikes on all trails above the Soquel Augmentation Line to this very day,...”. There is not a “no bikes interpretation of the deed”. Mountain bikes were not an issue in the mid-1980s and, therefore, were not addressed. The California State Park and Recreation Commission developed a “Non-Motorized Bike Use” policy (Policy IV.2, amended in 1994). The Forest of Nisene Marks State Park’s rules and regulations are consistent with the Commission’s policy. Please see response to comment number 4 and number 12 for a discussion of mountain bikes and the development of a comprehensive Unit Trails Plan to be completed after approval of the General Plan.

46. The text as written on page 67, Existing Trails, is correct. Bicycles are restricted to the fire road and other designated trails. The unpaved fire road allows bicycle access through the entire park.

47. In order to clarify the dates when the term “natural preserve” was defined in the Public Resources Code, the Existing Conditions section, Deed Restrictions, page 74, paragraph three, will be revised as follows:

The term “natural preserve” is meant in a generic sense. That is, that the property should receive a high level of resource protection, that the natural surroundings should be preserved, and public use limited to activities such as camping, nature study, hiking, and associated activities. It does not incorporate the definition of “natural preserve” as specified in the Public Resources Code (PRC). ~~(Section 5019.71), which was not adopted until 1978, some thirteen years after the deeds were recorded. In 1971, six years after the deed was recorded, PRC Section 5001.5(f) established a definition for natural preserves. Section 5001.5 of the PRC was repealed in 1978 and added to the PRC as Section 5019.7.~~

48. The intent of the land management zones is to provide three levels of management based on the diversity of recreation opportunities, visitor use concentration, and resource sensitivity and protection. The Department agrees that the area designated as low allowable use intensity (Land Managed for Resource Protection and Low Intensity Recreation) contains many sensitive resources and areas of rugged steep topography. As noted on page 102, this area will “be managed with a very low tolerance for resource degradation from visitor use, and management action could be taken to change visitor use patterns if such degradation occurred.” Page 102, paragraph 2 also explains that “any allowable uses must be subordinate to the integrity of these resource values.” The activities listed as typical in this zone (primarily based on walking, hiking, or nature study) are those that will most often be experienced. However, other uses and activities may also occur if conditions are appropriate. Because this area is remote, has limited access, and contains steep, rugged topography, the number of visitors and the use intensity will be limited.

The Department has emphasized its commitment for resource protection in the many park-wide goals and guidelines, as well as the description of the management intent for this low use intensity management zone. The priority for this zone remains resource protection. Development of the comprehensive trails plan will provide further detailed evaluation of the park trails and appropriate use.

To clarify the intent of the management zones, the text will be revised as follows:

The Plan section, Low Allowable Use Intensity, page 102, paragraph 3:

Visitor experience would be primarily based on hiking, walking, or nature study characterized by light to moderate use focused on marked and maintained trails. This zone also includes smaller areas that may accommodate some moderate use, where secondary activities would be considered. There would be some management presence to accommodate resource protection and visitor use.

The Plan section, Resource Protection and Low Intensity Recreation, page 110, paragraph 2:

Visitor experience and recreation opportunities in this area would be primarily hiking, walking, ~~biking~~, or nature study characterized by light to moderate use on designated and maintained trails. This zone also includes smaller areas, or corridors, that may accommodate some moderate use, where secondary activities (such as bicycling) may be considered. These secondary activities must be consistent with resource management objectives and desired visitor experiences within this low intensity use area. This land management

designation would provide substantial opportunities for scientific study of natural processes in undisturbed conditions. This area would have limited visitor access (due to the remoteness and topography) and would accommodate a lower number of visitors than the moderate or higher intensity recreation zones.

49. The Department has determined that the sub-classification of Natural Preserve is not appropriate, and that the State Park designation adequately protects the significant resources at this unit. Please see the response to item number 25 for further discussion.

50. The general plan emphasizes the Department's commitment for resource protection throughout the park. The document proposes numerous goals and guidelines as well as potential mitigation measures to minimize any potential resource impacts from facilities and visitor use. Guidelines include: "Special emphasis will be placed on resolution of unauthorized uses of the Park" (pg. 91); "Provide appropriate access and opportunities for the visiting public...while not degrading the natural/cultural features and ecological processes" (pg. 92); "Future trails planning and construction should include the Department's specifications and policies concerning trail construction and maintenance, and be coordinated with soil erosion and sediment studies." (pg. 92); "Locate and design trails to provide access in areas where they would have the least impact on wildlife habitat and ecological systems." (pg. 110); "Locate facilities away from any sensitive natural or cultural areas to minimize impacts to these resources." (pg. 112); "Avoid facility development on steep slopes with potential erosion problems...design facilities to discourage walking or biking on unimproved, steep slopes." (pg. 145); "All new projects, rehabilitated facilities, and increased visitor use in the Park will be evaluated to ensure that they do not contribute to the degradation of water quality. Any accelerated erosion, sedimentation, and habitat degradation will be identified and reduced or eliminated to the extent feasible." (pg. 165); "Design recreation facilities to minimize water quality impacts by avoiding disturbance to or protecting steep slopes, highly erodible soils and riparian and wetland areas." (pg. 165); and "Develop ongoing programs of trail maintenance and watershed restoration for areas disturbed by recreational use." (pg. 165).

Please see response to item number 4, item number 11, and item number 12 for discussions regarding the deed and bicycle recreation in the park.

51. Trail use, including safety issues on single track and multi-use trails, will be thoroughly evaluated during development of the comprehensive Unit Trails Plan. Please see response to item number 11 and item number 12 for further discussion of bicycle recreation issues and the future trails plan.

52. The resource discussions presented in the General Plan were derived from field surveys (see page 13, footnote 6), scientific studies (see page 24, paragraph 1 and footnote 10), and the most current information provided by the appropriate state and federal resource and regulatory agencies, including the Department of Fish and Game and the U.S. Fish and Wildlife Service. The California Native Plant Society was also consulted and provided information for this plan. In the Environmental Analysis section, pages 137 and 138, it is clearly stated that appropriate vegetation and wildlife surveys and surveys for rare, threatened, and endangered species will be conducted as part of the planning process for site-specific project development.

The Department disagrees with your statement that the final version of the plan “errors on the side of non-protection of resources.” The Plan section, Resource Management Goals and Guidelines, pages 84-94, contain numerous goals and guidelines that reinforce the Department’s priority to enhance and protect the park’s resources. Goals and guidelines discussed in the plan include the preparation of a resource management plan (page 84); evaluation of all known or potential habitats for sensitive, rare, threatened or endangered species (page 85); protection or enhancement of riparian areas and natural wetlands (page 86), the protection, restoration, and maintenance of native ecosystems and indigenous flora and fauna through active resource management programs (page 87); the preservation and protection of sensitive native plants and plant communities (page 88); the protection of all sensitive wildlife species and their habitats (page 89); the development of a long-term program of control and/or eradication measures to prevent the establishment and spread of non-native species (page 89); the protection of all sensitive wildlife species and their habitats (page 89); and providing recreational uses that will satisfy user needs and resource protection requirements (page 91).

Please see response to item number 31 and item number 32 for a discussion of the scope of this general plan.

Miller:

53. There is, per se, no “list of trusts and organizations which donated property to the CSP in Nisene Marks” on page 2 of the plan, as you have stated. There is mention of “Save-the-Redwoods League, Sempervirens Fund and other generous and far-sighted donors.”

54. The references on page 18 will be changed from red willow to arroyo willow. The text will be revised as follows:

~~Red Willow~~ Arroyo Willow Series. ~~Red Arroyo~~ willow series occurs on stream terraces along the lower reaches of streams in the Park, where the overstory canopy is open. Areas where this community was observed include along an unnamed

tributary to Mangel's Creek and along Aptos Creek, downstream from the red alder series. Species in this community include ~~red~~arroyo willow (*Salix laevigatalasiolepis*), blue elderberry...

Figure 6 will be revised to indicate Arroyo Willow Series instead of Red Willow Series.

55. Page 16, Existing Conditions, Woodland and Forest Communities, will be revised as follows:

In addition to these two areas, there are old-growth trees within a large grove of ~~white-red~~ alders just west of Aptos Creek near the Park's southern boundary,...

56. Table 3, Invasive Exotics of Priority Concern Within The Forest of Nisene Marks State Park, page 196, will be revised to include Cape ivy, *Delairea odorata*, previously known as German ivy, *Senecio mikanioides*.

57. *Quercus parvula* var. *shrevei* is part of the interior live oak complex. The common name for this variety is Shreve (or Shreve's) oak. *Q. parvula* var. *shrevei* was recognized in The Jepson Manual, but is still not fully accepted, according to Kashani and Dodd ("Genetic Differentiation of Two California Red Oak Species, *Quercus parvula* var. *Shreveii* and *Q. wislizeni*, based on AFLP Genetic Markers," in USDA Forest Service Gen. Tech. Rep., PSW-GTR-184, 2002). It is considered synonymous with interior live oak by many ecologists. General references to interior live oak in the General Plan would also include this variety.

58. Thank you for providing this additional resource information. The following change will be made to the document: In the Existing Conditions section, page 15, Coyote Brush Series, add the following underlined sentence to the existing text:

This area has been subjected to repeated disturbance by off-road vehicle use roughly between 1940 and the 1980s and substantial erosion is evident. Coyote brush is also found in the lower area of the park, especially in Mangels Ranch. Scrub associates...

59. Figure 3 is intended to present only general slope information for the park. We appreciate your submission of additional slope information and will add it to our files of park information and resources.

60. Your comments regarding clintonia and slink-pod are noted. While you are correct that "some of these species are present in good numbers only in the

small section of the flat understory area next to George's picnic area East of the creek" the information provided in the plan is also accurate.

61. The text on page 63, Overlooks, is a discussion of the existing conditions of the park and is correct in noting that the Sand Point Overlook, West Ridge Trail Overlook, and Santa Rosalia Ridge Overlook all provide opportunities to view the Pacific Ocean. Alternative B would provide an additional vista point located in the Mangels Ranch area.

62. The CEQA Guidelines, Section 15121(a) describe the intent and scope of an EIR as "an informational document which will inform public agency decision-makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project." In this general plan, the "project" is described in The Plan section of the document and is graphically presented in Figure 8, Alternative B, the preferred alternative. It is this preferred alternative that is evaluated in the EIR, including ways to mitigate or avoid any potentially significant effects the project may have on the physical environment. The examples you raise concern existing conditions. It is not the purpose of the Plan or the environmental analysis section to analyze each and every existing condition that may need attention. As the park is managed in the future, specific management plans and projects will be developed to identify, prioritize, hopefully fund and implement improvements to existing conditions. As noted in the plan and elsewhere in these responses to comments, these future specific plans and projects will be appropriately evaluated as needed at that time.

63. The Declaration of Purpose presented on page 82 of The Plan section states: "The purpose of The Forest of Nisene Marks State Park is to preserve and protect the natural and cultural resources, wildland values, and supporting ecosystems...while providing opportunities for the visiting public to enjoy, experience, and be inspired by the unique and diverse topography, geology, biotic communities, and scenic views." Throughout the document, goals and guidelines have been developed to protect biotic communities and fragile soils. The Plan does not advance any project, development, or use of the Mangels Ranch area that would be deleterious to the area.

64. Allowable use intensities prescribe desired resource conditions, visitor activities, and provide guidance on how these areas will be managed. Additionally, allowable use intensities seek to protect and enhance park resources. A High Allowable Use Intensity is appropriate for the Mangels Ranch area. Located near the main entrance at the south end of the park, the Mangels Ranch area is ideal for a variety of activities, recreational and educational uses. Encouraging visitors to explore this area of the park could minimize intense use of the Rancho Aptos trail and entrance area. Visitors to the Mangels Ranch will be able to enjoy the unique plants, vistas, and ecosystems in this area. A high

allowable use designation for the Mangels Ranch area will allow appropriate visitor use while ensuring proper resource protection.

65. As noted in the titles of the various land management zones on Figure 8, Alternative B, Preferred Plan, (Land Managed for Resource Protection and Low Intensity Recreation, Land Managed for Resource Protection and Moderate Intensity Recreation, and Land Managed for Resource Protection and More Intensive Recreation), the Department is committed to resource protection and preservation in every designated zone of the park. Each zone has a different use intensity; however, all retain the goal of resource protection and contain guidelines to achieve this goal. Additionally, all park-wide goals for resource protection apply to each of these zones.

Jack:

66. The Department disagrees with your comment that the park is proposing a “reduced level of protection to resources in favor of intense recreation.” As discussed in The Plan section, page 109, Land Management Zones, each of the management zones will be managed for resource protection, as well as differing amounts of use intensity. The Resource Protection and More Intensive Recreation Zone is the smallest area of the park, located at the park-urban interface at the most southern end of the park property. Although this area is the most accessible to a variety of park users and recreation opportunities would be concentrated in this area, impacts to resources would be minimized. The guidelines developed for this area (page 112) emphasize the stated goal and the Department’s commitment to minimize impacts, especially the first bullet: “Locate facilities away from any sensitive natural or cultural areas, including streams and historic and archeological sites, to minimize impacts to these resources” and the second bullet: “use signs, fencing, walls, stairs and other features to direct visitors away from sensitive biological and cultural resources, as necessary, and to protect sensitive resources.”

The General Plan also proposes a number of park-wide goals and guidelines that emphasize resource protection. Please see response to item number 52 for a discussion of the enhanced resource protection proposed in the plan.

67. Although the information provided in the General Plan is adequate for the scope of this first tier document, the Department will be supplementing and updating this biological information with the addition of plant surveys (including special interest plants), bird surveys (including special interest and special habitat birds), and reptile and amphibian surveys (including species of special concern, particularly red-legged frog and yellow-legged frog).

Hicks:

68. Thank you for your support of the Preliminary General Plan/Draft EIR for The Forest of Nisene Marks State Park. The following change will be made to the Existing Conditions section, page 4, Figure 2, Existing Conditions map: Add “interpretive node” icon to the Porter Family Picnic Area.

69. The following change will be made to the Existing Conditions section, page 4, Figure 2, Existing Conditions map: Delete the “potable water” icon from the Emmett Reed Picnic Area.

70. The following change will be made to the Existing Conditions section, page 4, Figure 2, Existing Conditions map: The “potential acquisition” icon will be deleted.

71. The following change will be made to Figure 8, Alternative B: Add potable water, restrooms, and interpretive node icons at the “New trail camp location”.

72. The Department recognizes and appreciates the value and importance of volunteer labor in The Forest of Nisene Marks State Park. Park trails will be evaluated during the development of a comprehensive Unit Trails Plan for the entire park, which will occur after the approval of this General Plan. Please see The Plan section, page 92, first bullet, and response to item number 12.

73. The Department disagrees with your comment that the writers of the General Plan “seem to assume that what can be seen from certain sections of Aptos Creek Road represents the entire park.” The General Plan analyzes all aspects of the park and has followed all California Environmental Quality Act requirements for a first tier document. Please see response to item number 52 for a discussion of the resource information used in the preparation of this document.

74. As stated previously (please see response to items 10, 12, and 72), this plan does not support any additional trails. Trail location and maintenance, including evaluations of slope and soil type, are critical components of a comprehensive Unit Trails Plan and will be considered as that plan is developed.

75. The purpose of the General Plan is to provide a defined framework for the park’s development, ongoing management, and public use. It is meant to be broad in scope. Future plans and studies, including a comprehensive Unit Trails Plan, will be site specific and fully detailed.

76. The General Plan proposes land management zones based on resource sensitivity and protection, the diversity of recreational opportunities, and visitor use concentration in designated areas of the park. The land management zones will allow consideration of an array of recreation activities and facilities

appropriate for these specific zones. All biologically sensitive areas will be considered as the comprehensive Unit Trails Plan and other plans and studies are undertaken.

Farber:

77. Rather than being “improvement goals” the goals and guidelines presented in the General Plan are designed to guide resource stewardship, facility development and interpretation, and future land use management for the park. The goals and guidelines are generally accepted CEQA methods to ensure ecosystem health is maintained and provide direction to meet desired goals for physical, natural, and cultural resources as well as social conditions.

78. The General Plan is a broad policy document that sets the direction and provides the vision for the park’s management and development. The plan is not intended to designate detailed facilities with specific size, design, and locations.

79. The Department views the potential Visitor Center as a valuable tool in educating visitors about the park, redwoods, ecology, stewardship, and local history. The Santa Cruz District is currently the second leading educational institution in the county (behind the public education system), providing educational information to over 200,000 people annually. The Department is committed to interpretation and education and believes a Visitor Center in The Forest of Nisene Marks State Park could play a pivotal roll in our interpretive efforts.

80. As stated in the Unit Vision discussion on page 82 of The Plan section, visitors will access the park from several points. The Department’s goal is to provide entrances to the park that will create a sense of entering a special place. The Area Goals and Guidelines specifically discuss goals and guidelines related to the park entrance on page 107. The guidelines state that the development of the improved entrance would provide for the restoration and protection of natural and cultural resources, and would be “guided by the intent to provide a sense of place, consistent with the park’s wildland values.” The goals and guidelines on page 87 emphasize the Department’s intent to maintain and protect the park’s native ecosystems, vegetation and wildlife. The improvements at the park entrance areas would utilize native plants, and would include native plant restoration and the establishment of buffers between facilities and sensitive resources.

81. Alternative B, the preferred alternative, proposes relocating one trail camp and adding one new campground. Neither of these camping areas would be located in zones designated for low intensity recreation, as shown on Figure 8, Alternative B. The trail camp, currently located in “the upper reaches” of the park, would be relocated to an area that is proposed for moderate intensity

recreation. The potential new camping area is proposed in the lower reaches of the park, in the zone designated for more intensive recreation.

82. The following revision will be made to the Existing Conditions section, page 75, AMBAG Regional Population and Employment Forecasts, paragraph 2:

Based on AMBAG's 1997 forecasts, the entire Monterey Bay region is expected to grow to a population of 920,908 people by 2020 (from ~~64,282~~ 642,822 people in 1995).

83. As stated on page 3, Purpose of this General Plan, "these guidelines propose improvements for land use compatibility, the nature and location of possible future developments, possible acquisition, and other specific actions." Improvements to the park would not be made until sufficient funding is available.

84. Although classified as Land Managed for Resource Protection and More Intensive Recreation in Alternative B, sensitive resources in the Mangels Ranch area will be protected. As indicated on page 112 in The Plan section, the Department has provided a number of guidelines that would avoid or minimize impacts to sensitive resources located in this management zone, including locating facilities away from sensitive areas, and using signs, fencing, walls, and other features to direct visitors away from sensitive resources. The entire park, including the Mangels Ranch area, is also guided by park-wide goals and guidelines for resource management, the discussion beginning on page 84 of The Plan section. Please see response to item number 63 for a further discussion of the Mangels Ranch area.

Henn:

85. The zone, Land Managed for Resource Protection and Low Intensity Recreation, will be given a high level of resource protection and will "be managed with a low tolerance for resource degradation" as the text describes on page 102. Conditions may exist in this zone that could support other types of recreation than what has been listed in the text as "typical" activities. These may be areas that do not have steep terrain, or do not contain erodible soils or other sensitive resources. Please see response to number 48 for more discussion on the land management zones, resource protection issues, and proposed text revisions.

The consideration of shared use on trails in the park will be evaluated during development of the comprehensive trails plan. Shared use would only be considered after a complete evaluation of site-specific resource conditions, safety, and desired visitor experience.

86. Please see response to item number 25 and number 47 for further discussion of natural preserves.

87. The historical perspective discussed in the General Plan is a broad overview. This discussion is not intended to present a detailed account of all aspects of the property's history.

88. Please see response to item number 31 for a discussion of the scope of this first tier document and item number 32 for a discussion of biological inventories.

89. Please see response to item number 11 for a discussion of unauthorized activities in the park.

Hoff/Muller:

90. The Declaration of Purpose presented on page 82 of The Plan states that "The purpose of The Forest of Nisene Marks State Park is to preserve and protect the natural and cultural resources, wildland values, and supporting ecosystems...while providing opportunities for the visiting public to enjoy, experience, and be inspired by the unique and diverse topography, geology, biotic communities, and scenic views." Throughout the document goals and guidelines have been developed to protect biotic communities and fragile soils. The General Plan, as written, does not reduce the level of protection to resources in favor of intense recreational use.

91. Please see response to item number 11 for a discussion of unauthorized activities in the park.

92. Development of a comprehensive biological inventory is not within the scope of this General Plan and first tier EIR, nor is it required by "General Plan directives". The Department has followed Public Resources Code (PRC) Section 5002.2(a) which states that the general plan "shall serve as a guide for the future development, management, and operation of the unit." With regard to the discussion of resources in the general plan, PRC Section 5002.2(b) states that the "resource element of the general plan shall evaluate the unit as a constituent of an ecological region and as a distinct ecological entity, based upon historical and ecological research of plant-animal and soil-geological relationships and shall contain a declaration of purpose,...". Please see response to item number 67 for a discussion of additional resource surveys scheduled for completion in the park.

The General Plan has proposed numerous goals and guidelines that will enhance protection and preservation of the park's sensitive native habitats. Please see response to item number 50 and number 52 for a discussion of these goals and guidelines.

Andre:

93. As part of the process of General Plan review and approval, the Park and Recreation Commissioners are provided with copies of the Preliminary General Plan/Draft EIR, as well as copies of all public comment and agency responses. All of this informational material is considered during this planning and approval process.

Advocates for Nisene Marks State Park/ Johnson:

94. As stated previously, a comprehensive Unit Trails Plan is proposed that will consider the trail system in the park, paying special attention to the variety of trail users, trail design, access, resource protection, trail maintenance, and potential impacts. Please see response to item number 12 for further discussion of the trails plan.

95. Thank you for your comment. Horseback riding will be added to the High Allowable Use Intensity Activities list on page 106.

96. The General Plan does not restrict equestrian use from any areas where horses are currently allowed. The future Unit Trails Plan will evaluate trails (hiking, biking, equestrian, and shared use) in the entire park and will develop proposals for appropriate use based on a variety of factors, including resource protection, access, and safety.

O’Rielly:

97. The general plan proposes three management zones, based on resource protection and use intensity, which will consider appropriate recreation (see The Plan section, pages 109-112 for a more complete description of these zones). A complete evaluation of shared use trails in the park will occur with the development of a comprehensive Unit Trails Plan, to be completed after approval of this General Plan. Although this General Plan is a broad policy document that sets the direction and provides the vision for the park’s management and development it does present numerous park-wide goals and guidelines that emphasize resource protection and mitigation measures that avoid or minimize resource impacts relating to visitor use and facilities.

Lockwood:

98. Currently, most of the trails in The Forest of Nisene Marks State Park are not authorized for bicycle recreation. Please see response to item number 11 and 12 for a further discussion of bicycle use and development of a Unit Trails Plan.

Stewards of Soquel Forest/ Ciesla:

99. Thank you for providing additional information regarding recent land acquisitions, open space, and regional trail opportunities. The information and contacts will be useful during development of the park's comprehensive Unit Trails Plan.

100. The map provided on page *iv* (Figure 1, Vicinity Map) is a general location map for the park and is adequate for this intended use. The map was not designed to delineate all publicly held lands. Information on the relationship of the park to publicly held lands in the region will be useful and appropriate in the Unit Trails Plan within a discussion of regional trail opportunities.

101. The discussion presented on page 50 presents information on the history of the park (1983 – present) and decisions pertaining to land acquisition. It is not a discussion of existing recreation use or potential.

102. Although informative, neither the cultural, historic, educational, nor interpretive resource sections are meant to be totally definitive. The Hinkley Creek area continues to hold many untold and yet to be discovered stories.

103. Cusack's Meadow will be added to the list of potential sites for interpretive panels (page 97, Interpretive Panels). The text preceding the list will be revised as follows:

Interpretive panels are ~~needed~~ desirable at the following locations:

104. The Department has been dealing with illegal activities at Buzzard Lagoon and many other areas throughout the park since the park's inception. We will continue to patrol and take preventative measures in this and all areas of the park as resources allow.

105. The fire road entrance to the Soquel Demonstration State Forest will be added to the list of interpretive areas on page 97.

106. A discussion of detailed regional connections and trail opportunities is not appropriate for the scope of this general plan. This information will be presented as part of the subsequent Unit Trails Plan.

107. The Department concurs with the current designation of the Cusack's Trail as a Class 3 trail, as stated on page 71. Mountain bike use is restricted to the fire road only above the Steel Bridge. Mountain bike use, therefore, is prohibited on the Cusack's Trail. Mountain bike use on this trail is currently illegal and such use should be strongly discouraged within the mountain biking community. The Department's position is to fully enforce the law in regards to this and all illegal

activities within the park. All trails, including Cusack's Trail, will be fully evaluated in the comprehensive Unit Trails Plan.

108. The Existing Conditions section, page 67, Patterns and Levels of Use, accurately notes that most park visitors are hikers, runners, and mountain bikers and that the park is used year-round. The survey information does not say that "intense use only originates at the bottom of the park" as you suggest. The survey actually reported that "the most intense use originates in the lower part of the Park." This statement does not imply that other areas of the park do not also receive intense use.

109. The General Plan does not state that "additional parking on Highland Way would be possible if there is a willing seller." The Plan section, Parking and Access, page 109, reads "The following are suggested areas for additional/improved parking, although further study is suggested for additional/alternative sites:". The Department has noted the need for parking off Highland Way. All viable sites for parking on park property will be considered.

110. State Parks continually receives and reviews information regarding potential acquisitions. The Department's priority is generally for properties that are adjacent to an existing park unit. However, properties near the park may also be considered. The Department will continue to evaluate all potential acquisitions from willing sellers and may purchase available properties as funds are available.

Citizens for the Preservation of the Forest of Nisene Marks State Park/ Parkin:

111. The General Plan proposes land management zones that may allow further consideration of appropriate recreational uses, including mountain bike activities, in certain areas of the park. The Draft EIR addresses the potential impacts of proposed facilities commensurate with the scope of the General Plan and this first tier environmental document. The environmental analysis presents potential impacts and mitigation associated with facility development. Mitigation measures that avoid or reduce impacts to vegetation, wildlife, erosion, water quality, cultural sites, and soils are addressed throughout the environmental analysis. The Department also requires a further evaluation of specific facilities and management plans at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level is necessary. This is considered the second-tier environmental review.

112. A detailed inventory of all of the park resources is not appropriate for the scope of this General Plan and first tier environmental impact report. The General Plan is a broad policy document that sets the direction and provides the vision for the park's management and development. The analysis of broad potential environmental impacts discussed in the Environmental Analysis section will provide the basis for future second level environmental review, which will

provide more detailed information and analysis for site-specific developments and projects.

113. In order to clarify the dates when the term “natural preserve” was defined in the Public Resources Code, the Existing Conditions section, Deed Restrictions, page 74, paragraph three, will be revised. Please see response to item number 47 for the complete text revision.

114. The Preliminary General Plan/Draft EIR contains numerous goals and guidelines as well as proposed mitigation measures that direct management and address impacts associated with mountain biking. The Plan section, pages 91-92, Recreational Uses, presents guidelines for appropriate visitor use, including “special emphasis will be placed on resolution of unauthorized uses of the Park” and “the planning and design of new facilities will consider capacity and use intensity so that significant ecological damage or deterioration will be prevented.” Page 145 discusses potential impacts and mitigation measures associated with erosion. Mitigation Measure Geo-2 would minimize potential erosion impacts by avoiding facility development on steep slopes with potential erosion problems, to the extent feasible, and designing facilities to discourage walking or biking on unimproved steep slopes. Water quality impacts and appropriate mitigation measures are discussed on page 165. Some of these measures include designing recreation facilities to minimize water quality impacts by avoiding disturbance to or protecting steep slopes, highly erodible soils, and riparian and wetland areas, and developing ongoing programs of trail maintenance and watershed restoration for areas disturbed by recreational use. Impact Bio 3, page 139, recognizes the potential impacts increased recreational activity may have on wildlife and proposes mitigation measures to minimize these impacts.

Please see response to item number 11 for a further discussion of unauthorized trail use.

115. Bicycling would not be a “typical” or primary use in the zone designated as Land Managed for Resource Protection and Low Intensity Recreation; however, it may occur depending on the topography, sensitive resources, and safety issues. The highest priority for this zone is resource protection with lower levels of visitor use. The zone designated as Land Managed for Resource Protection and Moderate Intensity Recreation also supports resource protection, but allows a higher recreation use than the low intensity zone. Please refer to response to item number 48 for a further discussion of these zones and proposed text clarifications.

116. The General Plan serves as a first-tier Environmental Impact Report as defined in Section 15166 of the California Environmental Quality Act (CEQA) Guidelines. The analysis of broad potential environmental impacts discussed in the Environmental Analysis will provide the basis for future second level environmental review, which will provide more detailed information and analysis

for site-specific developments and projects. It was determined that the General Plan proposals would not have any significant impacts on the environment once all proposed mitigation measures have been implemented.

This general plan is a program EIR which is also tiered. These are not mutually exclusive, and are encouraged in the CEQA Guidelines. Please refer to CEQA Guidelines Section 15152(h) which states: "There are various types of EIRs that may be used in a tiering situation. These include, but are not limited to, the following:...(3) Program EIR". CEQA Guidelines Section 15385 also states that "Tiering is appropriate when the sequence of EIRs is: (a) From a...program EIR to a program, plan or policy EIR of lesser scope or to a site-specific EIR."

CEQA Guidelines Section 15162 refers to the requirements that would trigger a subsequent EIR be prepared for an EIR which has been certified for a project. This guideline does not refer to the tiering process, where subsequent environmental analysis and review is completed as more detailed information and site-specific developments are proposed following a first tier EIR.

117. The project description in the Environmental Analysis section on page 123 is a brief summary of the preferred plan, or project. This summary describes the management zones, allowable use intensity, and goals and guidelines. Details of these items are found in The Plan section, as indicated on page 123.

Santa Clara Valley Audubon Society/ Gray:

118. Development of a comprehensive biological inventory is not within the scope of this General Plan and first tier EIR. Please see response to item number 92 for a discussion of the Public Resources Code sections pertaining to development of a general plan and the resources section within the general plan.

Specific trail planning will be accomplished with the development of the comprehensive Unit Trails Plan. Please see response to number 12 for a more complete discussion of the trails plan.

119. A comprehensive Unit Trails Plan that will address the issues of trail use and user compatibility will be developed subsequent to approval of this General Plan. Please see response to number 12 for a more complete discussion of the trails plan.

120. The Department is very aware of and concerned about the impact of corvids on other bird populations. The General Plan recognizes this issue in Impact Bio-3 and provides a mitigation measure that addresses potential impacts. Mitigation Measure Bio-3 on page 140 includes actions such as educating the public concerning non-native species and the effects on native vegetation and wildlife as well as educating the public on the dangers of intentional or unintentional feeding of park wildlife. To reinforce the Department's

commitment to reducing this problem, the following guideline will be added to Wildlife Management, (pages 89-90), in The Plan section:

Reduce and, where possible, eliminate wildlife access to human food and garbage, by using wildlife-proof trash containers throughout the park. Educate the public about the detrimental effects that supplanting wildlife food sources with human food can have on the ecological balance of the park and surrounding region.

Miller:

121. The aesthetic resources, as defined on page 62, describe the existing visual character or the visual resources, of the park. The “seclusion and serenity” and “peace and solitude” mentioned in the introduction are important visitor experiences and contribute to the park’s special sense of place. The designation of land management zones, particularly the Resource Protection and Low Intensity Recreation zone, is designed to preserve and protect these special qualities found in The Forest of Nisene Marks State Park. The goals and guidelines on page 110 of The Plan section serve to reinforce protection and enhancement of these qualities.

122. The General Plan has addressed appropriate mitigation for trespassing issues on page 132 of the Environmental Analysis section. These potential mitigation measures include coordinating enforcement of public use of the park with adjacent jurisdictions, implementing an inspection and maintenance program for facilities, such as perimeter fencing, gates, etc., to minimize trespassing, and advocating responsible use of the park and enforcement of rules and regulations by providing information to the public.

Please see response to comment number 11 for a further discussion of unauthorized activities in the park.

123. The land use impacts referred to in the statement “potential programmatic land use impacts” are further defined in the paragraph under the Land Use heading on page 121. These actions include disrupting or dividing the physical arrangement of established surrounding uses, and actions conflicting with established recreational, educational, religious, or scientific uses. Proposals outlined in the General Plan would not cause significant impacts in these areas.

124. The Department disagrees with your comment that “Overall, this treatment of ‘Impacts to Common Vegetation and Species’ is incomplete, erroneous, ill-conceived and counter to the mission of the California State Parks.” Department staff have determined that increased development and visitor use could potentially adversely impact common vegetation communities and plant and wildlife species, but these impacts would not be considered significant. Plant and

animal species that are locally rare (although they may be more common elsewhere) are considered special-status species, as indicated on page 24, Existing Conditions, Special-Status Species. The General Plan presents numerous goals and guidelines for the preservation and protection of all special-status species. Please see response to number 52 for further discussion regarding the General Plan's proposals for the protection of the park's sensitive resources.

Web of Life Field School/ Butler:

125. Please see response to comment number 122 regarding trespassing and unauthorized activities in the park.

Miller (5/12/03):

126. Your comments are directed at proposed plans and recommendations discussed "in the Advocate's spring/summer 2003 newsletter" (Advocates for the Forest of Nisene Marks State Park). These are not plans or proposals presented in the General Plan's preferred alternative and therefore are not appropriate to discuss in the Draft EIR. The EIR evaluates potential impacts of the preferred plan, Alternative B, as well as any potential mitigation measures that would avoid or reduce significant impacts to the environment.

L'Wine:

127. The Department appreciates your concern regarding the important wildlife species and wildlife habitat currently existing in the park. This General Plan emphasizes the Department's commitment to protect and preserve wildlife and wildlife habitat. It also proposes enhancements to the park, which may include future facility development. Page 89, Wildlife Management, discusses the goal to "protect, perpetuate, and restore native wildlife populations and native aquatic species at The Forest of Nisene Marks State Park." Associated with this goal are numerous guidelines (pages 89-90) to direct park management in successfully accomplishing this goal.

Mountain Bikers of Santa Cruz (MBOSC)/ Baskin & Grant, LLP:

128. A discussion of detailed regional connections and trail opportunities is not appropriate for the scope of this general plan. This information will be presented as part of the subsequent Unit Trails Plan. Please see response to item number 12 for a further discussion of the future trails plan.

129. Any changes in trail classification will be evaluated during the development of the comprehensive Unit Trails Plan. Please see response to item number 12 for more information on the trails plan.

130. The Existing Conditions section, page 67, Patterns and Levels of Use, accurately notes that most park visitors are hikers, runners, and mountain bikers and that the park is used year-round. The survey information does not say that “intense use only originates at the bottom of the park” as you suggest. The survey actually reported that “the most intense use originates in the lower part of the Park.” This statement does not imply that other areas of the park do not also receive intense use.

131. As noted on Figure 8, Alternative B, there is a section of the zone “Land Managed for Resource Protection and Moderate Intensity Recreation” that borders the Soquel Demonstration State Forest and may provide opportunities to connect to the Ridge Trail in Soquel Forest.

132. Please see response to comment number 109 for a discussion on potential additional parking.

Midpeninsula Regional Open Space District/ Britton:

133. Thank you for providing additional information on your recent land acquisitions that have the potential for future regional trail connections with The Forest of Nisene Marks State Park. As noted, the Department values regional trail connections. The Plan presents goals and guidelines (page 92) that emphasize and encourage regional trail connections and coordination with other land management agencies and organizations to further these goals.

Sierra Club/ Jammal: (petition)

134. Please see response to item number 31 for a discussion of the scope of the General Plan and number 32 for discussion of a biological inventory.

135. Development of a comprehensive trail plan is not within the scope of this General Plan and first tier Environmental Impact Report. Please see response to item number 12 for further discussion of the Unit Trails Plan to be completed subsequent to approval of the general plan. Please see response to item number 31 for a discussion of the scope of this document.

136. The Declaration of Purpose presented on page 82 of The Plan states that “The purpose of The Forest of Nisene Marks State Park is to preserve and protect the natural and cultural resources, wildland values, and supporting ecosystems...” Throughout the document goals and guidelines have been developed to protect biotic communities. Resource Management Goals and Guidelines, pages 84-94, contain numerous goals and guidelines that reinforce the Department’s priority to enhance and protect the park’s resources, especially sensitive resources. Please see response to item number 52 for a further discussion of these goals and guidelines. Each of the management zones as

discussed in The Plan section, page 109, will be managed for resource protection, as well as differing amounts of use intensity.

U.S. Department of Commerce, NOAA, National Marine Fisheries Service/
Rutten:

137. Thank you for providing additional information on stream crossings with the inclusion of the NOAA Fisheries Southwest Region's *Guidelines for Salmonid Passage at Stream Crossings*. This information will assist the Department in achieving the goals of protection and enhancement of the fishery resources within The Forest of Nisene Marks State Park.

138. The Department is committed to protection and restoration of aquatic habitats, as emphasized by the guidelines on page 90: "All stream channels should be protected from human-induced erosion" and "site-specific plans to enhance riparian and in-stream conditions will be prepared and implemented as necessary." The Department will evaluate trail locations during the development of the future comprehensive Unit Trails Plan to be completed after approval of the General Plan.

139. State Parks abides by and enforces California Department of Fish and Game rules and regulations.

140. Throughout the General Plan the Department has shown a commitment to enhanced resource protection and preservation. Please see response to item number 66 for further discussion of resource protection.

141. Development of a comprehensive biological inventory is not within the scope of this General Plan and first tier EIR, nor is it required by "General Plan directives". The Department has followed Public Resources Code (PRC) Section 5002.2(a) which states that the general plan "shall serve as a guide for the future development, management, and operation of the unit." With regard to the discussion of resources in the general plan, PRC Section 5002.2(b) states that the "resource element of the general plan shall evaluate the unit as a constituent of an ecological region and as a distinct ecological entity, based upon historical and ecological research of plant-animal and soil-geological relationships and shall contain a declaration of purpose,...". Please see response to item number 67 for a discussion of additional resource surveys scheduled for completion in the park, and response to item number 31 for a further discussion of the scope of this first tier environmental document.

ROMP/ Nam:

142. The value and importance of regional trails and regional trail connections has been emphasized throughout this document. The Plan section, page 92, Access and Trails, presents a goal and associated guidelines confirming the

Department's support of regional trail objectives and coordination with other land management agencies to share information and monitor resource conditions. During the development of a Unit Trails Plan, park trails, access locations, and trail corridors will be evaluated, and specific trail classifications will be determined.

Gaffney:

143. The Department agrees that any revision of trail classification and use requires more detailed analysis of resource sensitivities and an evaluation based on a regional context. This is not within the scope of this general plan, which is a broad policy document. A comprehensive Unit Trails Plan is proposed that will address numerous trail development issues, including safety, access, location, appropriate users, sensitive resources, and maintenance. The trails plan will follow all CEQA requirements for appropriate environmental analysis and public involvement. Please see the goal and guidelines on page 92 in The Plan section, as well as response to item number 12, for further discussion of trails planning for the park.

144. With the plan adoption, the majority of the upper areas of the park would retain the designation of Land Managed for Resource Protection and Low Intensity Recreation. Portions of this area may be suitable for other forms of recreation than what is presented as "typical" activities in this zone. Extensive studies and site-specific evaluations would be completed in order to make this determination. Please see response to comment number 48 for further discussion of the land management zones, response to comment number 11 for a discussion of unauthorized uses in the park, and response to comment number 114 for a discussion of potential mitigation measures discussed in the environmental analysis section that may be associated with mountain biking.

145. The environmental analysis presented is appropriate for this first-tier Environmental Impact Report. This document presents numerous goals and guidelines, as well as potential mitigation measures, to protect and preserve the sensitive resources in the park, including vegetation, wildlife, wetlands, water quality, and soils. Please see response to comment number 52 for further discussion of particular goals, guidelines, and mitigation measures emphasizing resource protection as well as a discussion of the information (including surveys) used to prepare this document. Please see response to item number 67 for information on future surveys of the park.